



Women's International League for Peace and Freedom

United States Section

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June 28, 1999

5967 '99 JUL -1 P1:47

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Land, Room 1061
Rockville, MD 20852

Re: Docket No. 98N-1038, "Irradiation in the Production, Processing, and Handling of Food"

Dear Administrator:

On behalf of our membership, I urge you not to weaken food labeling requirements for irradiated foods.

Now irradiated foods must carry a statement saying the food has been irradiated. It must also be clearly labeled with the RADURA, the international symbol for irradiated food.

We have learned that the FDA is being asked to change this requirement to label irradiated food under the category of "cold pasteurization."

We strongly object to this proposed change because it would be misleading and untruthful. Use of the phrase "pasteurization" would give the impression that the food has been pasteurized. Pasteurization is a process involving rapid heating and cooling of the product. Irradiation is a totally different process that zaps the product with huge jolts of radiation, actually changing the properties of the food.

Dropping reference to irradiation processing would violate the consumer's right-to-know what is in their food and how it is processed. Irradiation reduces the vitamins and other nutritional values and changes chemical and physical properties of the food that affects the flavor, sensory and spoilage qualities. We know of no such effects from pasteurization.

The proposed change is not just a semantic exercise. Each of those processes has a distinct and different effect on food. Many independent scientists demonstrate that irradiation causes slight chemical changes that result in particles that could cause adverse health effects. Adverse health effects have occurred to laboratory test animals fed irradiated foods. It has not been control tested on humans. All consumers have a right to know whether their food has been irradiated.

We urge that all food that has been irradiated MUST continue to be clearly labeled so that consumers will know this. This rule must be maintained as long as food is

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Nobel Peace Prize 1931

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Emily Greene Balch
Nobel Peace Prize 1946

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being irradiated. There are always new consumers coming along from our own young people, to those who move here from other countries. All must be able to know whether their food has been irradiated or not.

We request that all the comments you receive on this issue be posted on the FDA website. The public needs to know what other people (and representatives of food and nuclear businesses) have to say about this issue. We believe too many public health decisions have been made against the public interest, because of corporate interests' influence.

It is obvious that this rule is being proposed by the food and nuclear industries which want to avoid public reluctance to buy the irradiated food. THE PUBLIC HAS A RIGHT TO KNOW!!

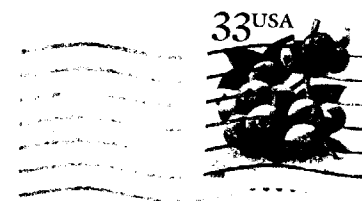
Please retain the requirement to clearly label irradiated foods. We urge you to stand firm for the public health interest in the case of this proposed rule change.

Sincerely,

A handwritten signature in black ink that reads "Pat Birnie". The signature is fluid and cursive, with the first name "Pat" and last name "Birnie" clearly distinguishable.

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